

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PERPETUAL ASHARE,

Plaintiff,

v.

SONTAG & HYMAN, P.C., MARC H.  
HYMAN, EAST HARLEM MEC PARCEL C  
LP., EAST HARLEM MEC PARCEL C  
HOUSING FUND DEVELOPMENT  
CORPORATION, METRO 125, INC., and  
RICHTMAN PROPERTY SERVICES, INC.,

Defendants.

**Civil Action No: 25-cv-02834-GHW-KHP**

**AFFIRMATION IN SUPPORT**

STATE OF NEW YORK )

)ss.:

COUNTY OF NEW YORK )

**MATTHEW K. FLANAGAN**, being duly sworn, deposes and says as follows:

1. I am a Shareholder of Marshall Dennehey, P.C., attorney for Defendants, Sontag & Hyman, P.C., and Marc H. Hyman in the above-captioned action (hereinafter “Hyman Defendants”).

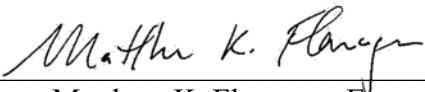
2. I submit this affirmation in support of the attached Memorandum of Law in Support Hyman Defendants’ Motion to Dismiss Plaintiff’s Complaint for failure to state a claim pursuant to 12(b)(6).

3. Attached herein as **Exhibit A** is a true and accurate copy of Plaintiff’s Complaint.

**WHEREFORE**, it is respectfully requested that the Hyman defendants' motion to dismiss be granted in its entirety; and for such other and further relief as the Court deems just and proper.

I, Matthew Flanagan, do state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 3, 2025  
New York, New York

  
Matthew K. Flanagan, Esq.